U.S. ENVIRONMENTAL PROTECTION AG
POLLUTION REPORT

I. HEADING

Date: November 10, 1997
Subject: Metro Plating Time Critical Removal Action Site, Detroit, Wayne County, Michigan
From: Robert M. Buckley, OSC, U.S. EPA, RS1, Grosse Ile, MI (buckley.robert@epamail.epa.gov)

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POLREP No.: 2

II. BACKGROUND

Site No.:	B503
Delivery Order Numbers:	5001-05-431 (RES) 5001-05-687 (EQM)
Response Authority:	CERCLA
Cerclis Number:	MID 985 656 800
NPL Status:	Not on NPL
MDEQ Notification:	MDEQ notified
Latitude/Longitude:	42°22'19" North/83°04'30" West
Start Date:	September 22, 1997
Completion Date:	NA

III. SITE INFORMATION

The Metro Plating Inc. (MPI) site is located at 220 E. Milwaukee Street in Detroit, Wayne County, Michigan. The Metro Plating site is an abandoned electroplating, anodizing, and polishing facility which operated under the name of Metro Plating. In November 1996, the City of Detroit Environmental Department requested the U.S. EPA Region 5 Office of Superfund, Emergency Response Branch evaluate the property for a potential Emergency and/or Expedited Response Action.

Analytical results from samples collected during the site assessment on April 17, 1997, indicated that vats and drums

contained various solutions with corrosive characteristics (pH ranging from 0.32 to 13.2). Many of the samples also contained high levels of TCLP zinc, nickel, chrome, copper, and lead. On August 1, 1997, an Action Memoranda was signed authorizing a time critical removal action. (Refer to POLREP #1 for more detailed site information.)

IV. RESPONSE INFORMATION

A. Situation

1. Current situation:

U.S. EPA, ERCS (EQM and their subcontractor Inland Waters Pollution Control (IWPC)), and START re-mobilized to the site on November 3, 1997, to resume cleanup activities and load and transport waste off site.

2. Removal activities to date: October 10 - November 9, 1997

On October 10, 1997, after demobilization, the U.S. EPA OSC and enforcement specialist retrieved and reviewed facility records.

U.S. EPA, ERCS, and START were demobilized from site between October 11 and November 3, 1997 except for activity on October 21 and 23, 1997. On October 21, 1997, U.S. EPA, START, and an ERCS chemist mobilized to site and collected samples from the wastestreams for waste acceptance. On October 23, 1997, the U.S. EPA OSC and Civil Investigator, START, a representative from the Wayne County Department of the Environment Air Pollution Control, and a potentially responsible party (PRP) met on site to discuss past operations and the site's history.

On November 3, 1997, U.S. EPA, ERCS, and START re-mobilized to site. ERCS re-established a decontamination area, labelled vat and drums according to wastestreams, and swept and removed debris from 2 rooms.

On November 4, 1997, IWPC/City Environmental (City) mobilized a vacuum truck, and ERCS loaded approximately 200 gallons of waste acid liquids (see Key Issues). IWPC/City transported the load to City Environmental, Detroit, Michigan for treatment and disposal.

On November 5, 1997, Hi-Po Environmental, Inc. (Hi-Po) mobilized a vacuum truck to load and transport the cadmium-contaminated base/neutral liquid and chromium-contaminated acid liquid wastestreams in two separate loads to City Environmental. There was a slight delay as an inspection of the interior of the tanker found sludge from a previous load. The vacuum truck departed site to be cleaned at City and then returned for the loads. One load of approximately 2,806 gallons of base/neutral liquids from on-site vats, pit, and drums was transported to City for treatment and disposal. The Hi-Po vacuum truck also loaded and transported approximately 1,275 gallons of acid liquid from vats and drums to

City for treatment and disposal. ERCS transferred the cyanide-contaminated caustic liquid from the vats to 10 DOT-shippable, 55-gallon, polyethylene drums.

On November 6, 1997, ERCS removed solids from drums, cut poly drums, and began removing and staging vats from the fenced area and pit in Room 1.

On November 7, 1997, ERCS completed removing vats from pit area. ERCS continued removing solids from drums, cutting drums, and began loading hazardous debris from the floors and vat areas, cut drums, and vat liners into a 20-cubic yard rolloff box.

On November 8, 1997, ERCS completed removing solids from drums and cutting drums. ERCS began removing debris and solids from the pit where the vats were located.

On November 9, 1997, ERCS began removing liners from the vats (see Key Issues).

3. Enforcement:

Enforcement activities are ongoing.

B. Planned Removal Activities

Site health and safety plan implementation will be continued. Site security will be maintained. Any contaminated soil or sludge found on site will be removed. Contaminated debris will be consolidated for disposal. All hazardous waste will be transported and disposed in compliance with U.S. EPA's Off Site Rule (40 CFR Section 300.440). A limited extent-of-contamination (EOC) study of the pit/building area will be comp[leted to determine if any soils under or around the building were contaminated by plating wastes. All highly contaminated soil will be identified in the EOC and disposed. All contaminated surfaces of the building and especially the pit will be pressure washed.

C. Next Steps

Vat liner removal will be completed, and vats will be decontaminated and sent as scrap metal for recycling. Disposal arrangements will be finalized. Disposal of all hazardous waste including cyanide-contaminated caustic liquids and hazardous debris will be completed. An Extent of Contamination study will be completed in the pit/building area to determine the affects of plating wastes on subsurface soils.

D. Key Issues

Analytical results from the soil samples collected during the extent of contamination study of the fenced area were received. These results indicated that no contaminants were detected above regulatory limits.

On November 4, 1997, only 200 gallons of waste acid liquids were loaded and transported by IWPC/City Environmental to City Environmental. After 200 gallons were loaded into the vacuum truck, a strong exothermic reaction began inside the truck. The reaction was believed to be caused by residue of phosphate liquid and sludge from a previous load hauled in the truck. This determination was based on the fact that hazard categorization (hazcat) and compatibility testing were completed for the liquids that were loaded. Work on site was disrupted for the entire day during attempts to stop the reaction, send the vacuum truck to the facility, and obtain another vacuum truck. The reaction inside the tank released a vapor cloud from the blower of the vacuum truck. The vapor cloud dissipated in a short period of time. Air monitoring of the cloud detected no contaminants above background with an organic monitor, hydrogen cyanide monitor, and multi-gas monitor (hydrogen sulfide, carbon monoxide, lower explosive limit, and percent oxygen). On November 5, 1997, a local citizen visited the site to inquire regarding the release on the previous day.

On November 9, 1997, the three IWPC workers from Detroit neither showed for work nor informed the IWPC response manager.

V. COST INFORMATION

Estimated Costs: (as of November 6, 1997)

	Ceiling	Total to Date*
Extramural Costs		
ERCS Contractor (RES)	$ 30,000	$ 18,171*
ERCS Contractor (EQM)	$260,000	$ 52,560*
START Contractor (E&E)	$ 35,000	$ 9,061
Total Extramural Costs	$325,000	$ 79,792
Intramural Costs		
U.S. EPA Direct Cost	$ 19,800	$ 3,225
U.S. EPA Indirect Cost	$ 39,000	$ 6,998
U.S. EPA Other Costs	$ 1,200	$ 0
Total Intramural Costs	$ 60,000	$ 10,223
Project Ceiling	$387,000	
Estimated Total Costs to Date		$ 90,015
Percent of Project Funds Remaining	76.74%	

*Includes awaits, except for disposal and demobilization.

VI. DISPOSITION OF WASTES

Table 1

Waste Disposal Summary
Metro Plating Site

Wastestream	Quantity	Date Shipped	Manifest Number	Disposal Facility
RQ Waste corrosive liquid, NOS (waste acid, D002)	200 gallons	11/4/97	MI4590452	City Environmental, Inc., Detroit, MI
RQ Hazardous waste liquid, NOS (D006)	2,806 gallons	11/5/97	MI4399617	City Environmental, Inc., Detroit, MI
RQ Waste corrosive liquid, NOS [illegible] acid (chromium, D002)	1,275 gallons	11/5/97	MI4399622	City Environmental, Inc., Detroit, MI